

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PIMCO FUNDS: PIMCO TOTAL RETURN FUND, *et al.*,

Plaintiffs,

v.

PETRÓLEO BRASILEIRO S.A., *et al.*,

Defendants.

Civil Case No.

**RULE 7.1 DISCLOSURE
STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for plaintiffs provides the following information:

1. The PIMCO-sponsored investment funds referred to in the Complaint are investment vehicles advised by Pacific Investment Management Company LLC. Allianz SE (Xetra: ALV; OTC Markets Group: AZSEY) is a publicly held corporation that indirectly owns more than 10% of Pacific Investment Management Company LLC.

2. Plaintiff Accident Compensation Corporation has no parent corporation or publicly held corporation owning 10% or more of its stock.

3. Plaintiff Allianz Global Investors GmbH is a wholly-owned subsidiary of Allianz Asset Management AG. Allianz Asset Management AG is a partial directly and partial indirectly wholly-owned subsidiary of Allianz SE. Allianz SE (Xetra: ALV; OTC Markets Group: AZSEY) is a publicly held corporation with no parent corporation or publicly held corporation owning 10% or more of its stock.

4. Plaintiff Allianz Life Insurance Company of North America is a wholly-owned subsidiary of Allianz of America, Inc. Allianz of America, Inc. is not a publicly traded company and is, in turn, wholly-owned by Allianz Europe B.V. Allianz Europe B.V. is a wholly-owned

subsidiary of Allianz SE. Allianz SE (Xetra: ALV; OTC Markets Group: AZSEY) is a publicly held corporation with no parent corporation or publicly held corporation owning 10% or more of its stock.

5. Plaintiff Allianz Retirement Plan – Property/Casualty is a qualified defined benefit pension plan sponsored by AZOA Services Corporation. AZOA Services Corporation is a wholly-owned subsidiary of Allianz of America, Inc. Allianz of America, Inc. is a wholly-owned subsidiary of Allianz Europe B.V. Allianz Europe B.V. is a wholly-owned subsidiary of Allianz SE. Allianz SE (Xetra: ALV; OTC Markets Group: AZSEY) is a publicly held corporation with no parent corporation or publicly held corporation owning 10% or more of its stock.

6. Plaintiffs Aon Hewitt Group Trust for the Long Credit Bond Fund and Aon Hewitt Group Trust for the Intermediate Credit Bond Fund are tax-qualified trusts funding retirement plans sponsored by Aon Hewitt Investment Consulting, Inc. Aon Hewitt Investment Consulting, Inc. is an indirect, wholly-owned subsidiary of Aon plc. Aon plc has no parent corporation or publicly held corporation owning 10% or more of its stock.

7. Plaintiff Ashwood Investments Limited is a limited liability company that is wholly-owned by a Cayman Islands trust that has no parent corporation or publicly held corporation owning 10% or more of its stock.

8. Plaintiff Baha'i World Centre is a religious organization and has no parent corporation or publicly held corporation owning 10% or more of its stock.

9. Plaintiffs Blue Cross Blue Shield of Minnesota, Inc. and MII Life, Inc. are wholly-owned subsidiaries of Aware Integrated, Inc., which has no parent corporation or publicly held corporation owning 10% or more of its stock.

10. Plaintiffs The Boeing Company Employee Retirement Plans Master Trust and The Boeing Company Employee Savings Plans Master Trust are tax-qualified trusts funding retirement plans sponsored by The Boeing Company and affiliates. The Boeing Company is a publicly held corporation with no parent corporation or publicly held corporation directly owning 10% or more of its stock. As of December 31, 2014, State Street Corporation was the beneficial owner of 11.2% of outstanding stock of The Boeing Company, approximately 59% of which (or approximately 7% of total shares outstanding) it held in its capacity as Trustee for The Boeing Company Employee Savings Plans Master Trust on behalf of participants in 401(k) plans funded by the Savings Plans Master Trust.

11. Plaintiff Cathay Multi-Strategy High-Yield Bond Fund is a fund managed by Cathay Securities Investment Trust Co. Ltd., which is a wholly owned subsidiary of Cathay Financial Holding Co., Ltd. Cathay Financial Holding Co., Ltd. is a publicly traded company that has no parent corporation or publicly held corporation owning 10% or more of its stock.

12. Plaintiff Con-Way Retirement Master Trust is a trust that holds or held the assets of multiple retirement plans established pursuant to the Employee Retirement Income Security Act of 1974. The plans' named fiduciary is the Con-way Inc. Administrative Committee, which was created by Con-way Inc. Con-way Inc. has no parent corporation or publicly held corporation owning 10% or more of its stock.

13. Plaintiff Cummins Inc. and Affiliates Collective Investment Trust is a trust established by Cummins Inc. Cummins Inc. has no parent corporation or publicly held corporation owning 10% or more of its stock.

14. Plaintiffs Desjardins Floating Rate Income Fund and Desjardins Global Tactical Bond Fund are mutual funds managed by Desjardins Investments Inc. Desjardins Investments

Inc. is wholly-owned by Desjardins Financial Corporation Inc. Desjardins Financial Corporation Inc. is wholly-owned by Desjardins Financial Holding Inc. Desjardins Financial Holding Inc. is wholly-owned by 9210-6764 Québec Inc. 9210-6764 Québec Inc. is wholly-owned by Fédération des caisses Desjardins du Québec. Fédération des caisses Desjardins du Québec has no parent corporation and no publicly held corporation owns 10% or more of its stock.

15. Plaintiff FCA US LLC Master Retirement Trust is wholly-owned by six pension plans sponsored by FCA US LLC. FCA US LLC is 100% owned by FCA North America Holdings LLC. FCA North America Holdings LLC is wholly-owned by Fiat Chrysler Automobiles N.V. Fiat Chrysler Automobiles N.V. common shares are listed on the New York Stock Exchange and the Mercato Telematico Azionario. Fiat Chrysler Automobiles N.V. has no parent corporation, and Exor S.p.A. owns 29.16% of its shares. Exor S.p.A.'s shares are listed on the Mercato Telematico Azionario. No publicly held corporation owns 10% or more of Exor S.p.A.'s stock.

16. Plaintiff FDP Global Fixed Income Portfolio is a wholly-owned investment fund of Professionals' Financial – Mutual Funds Inc. Professionals' Financial – Mutual Funds Inc. is a wholly-owned subsidiary of Professionals' Financial Inc. Professionals' Financial Inc. is 67.89% owned by Fédération des médecins spécialistes du Québec and 24.77% by Association des chirurgiens dentistes du Québec. Neither Fédération des médecins spécialistes du Québec nor Association des chirurgiens dentistes du Québec has a parent corporation or other publicly held corporation owning 10% or more of its stock.

17. Plaintiff Fireman's Fund Insurance Company is a wholly-owned subsidiary of Allianz Global Risks US Insurance Company. Allianz Global Risks US Insurance Company is a wholly-owned subsidiary of Allianz of America, Inc. Allianz of America, Inc. is not a publicly

traded company and is, in turn, wholly-owned by Allianz Europe B.V. Allianz Europe B.V. is a wholly-owned subsidiary of Allianz SE. Allianz SE (Xetra: ALV; OTC Markets Group: AZSEY) is a publicly held corporation with no parent corporation or publicly held corporation owning 10% or more of its stock.

18. Plaintiff Fubon Life Insurance Company, Ltd. is a wholly-owned subsidiary of Fubon Financial Holding Co., Ltd. Fubon Financial Holding Co., Ltd. is a publicly held corporation traded on the Taiwan Stock Exchange with no parent corporation or publicly held corporation owning 10% or more of its stock.

19. Plaintiff The Glencore Canada Pension Funds Trust – Bond Fund is a trust-based investment vehicle for defined benefit pension plans sponsored by Glencore Canada Corporation. Glencore Canada Corporation is a wholly-owned subsidiary of Glencore plc. Glencore plc is a publicly held corporation with no parent corporation or publicly held corporation owning 10% or more of its stock.

20. Plaintiff The Guardian Life Insurance Company of America is a mutual life insurance company with no parent corporation or publicly held corporation owning 10% or more of its stock. Plaintiff The Guardian Life Insurance Company of America Master Pension Trust is a trust sponsored by The Guardian Life Insurance Company of America, with no parent corporation or publicly held corporation owning 10% or more of its stock. Plaintiffs The Guardian Insurance and Annuity Company, Inc. and Berkshire Life Insurance Company of America are wholly-owned by The Guardian Life Insurance Company.

21. Plaintiff Hand Benefits & Trust Company is a state-chartered trust company organized under the laws of Texas with its principal place of business in Houston, Texas. Hand Benefits & Trust Company sponsors Plaintiff Hand Composite Employee Benefit Trust. Hand

Benefits & Trust Company is wholly-owned by Benefit Plans Administrative Services LLC. Benefit Plans Administrative Services LLC is wholly-owned by Community Bank Systems Inc. Community Bank Systems Inc. has no parent corporation and no publicly held corporation owns 10% or more of its stock.

22. Plaintiffs Harbor Commodity Real Return Strategy Fund and Harbor Emerging Markets Equity Fund (each a “Fund”) are each a Delaware statutory trust registered under the Investment Company Act of 1940. These Funds have no parent corporation and no publicly held corporation owns 10% or more of any Fund. Plaintiff Harbor Capital Group Trust for Defined Benefit Plans (the “Harbor Group Trust”) is a group trust for defined benefit retirement plan assets. Harbor Group Trust is comprised solely of defined benefit plan assets of two publicly traded corporations: Owens-Illinois, Inc. (ticker: OI) and Libbey, Inc. (ticker: LBY). The participants of the Harbor Group Trust are current and former employees of Owens-Illinois, Inc. and Libbey, Inc.

23. Plaintiffs Ingersoll-Rand Company Collective Trust and Trane Pension Plan Master Trust are trusts established by the Ingersoll-Rand Company and Trane U.S. Inc., respectively. The Ingersoll-Rand Company and Trane U.S. Inc. are wholly-owned subsidiaries of Ingersoll-Rand plc. Ingersoll-Rand plc has no parent corporation or publicly held corporation owning 10% or more of its stock.

24. Plaintiffs Kaiser Foundation Health Plan, Inc., Kaiser Foundation Hospitals, and Kaiser Foundation Health Plan of Colorado are public-benefit corporations. Plaintiff Kaiser Foundation Health Plan of Colorado is a wholly-owned subsidiary of Kaiser Foundation Health Plan, Inc. Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals have no parent corporation or publicly held corporation owning 10% or more of their stock.

25. Plaintiffs Kuwait Investment Authority, Kuwait Investment Authority - Global Bond Ex-US (Fixed Income) Core, and Kuwait Investment Authority - Global Bond Opportunistic Portfolio (collectively, “KIA”) are sovereign wealth funds. KIA is an independent public investment authority established pursuant to Law No. 47 of 1982 in the State of Kuwait. KIA has no parent corporation or publicly held corporation owning 10% or more of its stock.

26. Plaintiff Marshfield Clinic Master Trust for the Employees’ Retirement Plan and Salary Reduction/401(K) Plan is a retirement plan established pursuant to the Employee Retirement Income Security Act of 1974 and sponsored by Marshfield Clinic, Inc. Marshfield Clinic, Inc. is a tax-exempt organization under Internal Revenue Code Section 501(c)(3) that is part of a healthcare system whose parent entity is Marshfield Clinic Health System, Inc., which is also a tax-exempt organization under Internal Revenue Code Section 501(c)(3). Marshfield Clinic Health System, Inc. has no parent corporation or publicly held corporation owning 10% or more of its stock.

27. Plaintiff National Pension Services has no parent corporation or publicly held corporation owning 10% or more of its stock.

28. Plaintiff New Ships, Inc. Pension Master Trust is a trust established by Huntington Ingalls Industries, Inc. Huntington Ingalls Industries, Inc. has no parent corporation or publicly held corporation owning 10% or more of its stock.

29. Plaintiffs Nova Scotia Public Service Superannuation Fund and Nova Scotia Teachers’ Pension Fund have no parent corporation and there is no publicly held corporation owning 10% or more of their stock.

30. Plaintiff Oklahoma Tobacco Settlement Endowment Trust is a public trust and grant making state agency. It has no parent corporation and no publicly held corporation owns 10% or more of its stock.

31. Plaintiff PCS Administration Master Pension Trust is a retirement plan established pursuant to the Employee Retirement Income Security Act of 1974 sponsored by PCS Administration (USA), Inc. PCS Administration (USA), Inc. is an indirect, wholly-owned subsidiary of Potash Corporation of Saskatchewan. Potash Corporation of Saskatchewan has no parent corporation and no publicly held corporation owns 10% or more of its stock.

32. Plaintiff RBC Canadian Master Trust has no parent corporation or publicly held corporation owning 10% or more of its stock.

33. Plaintiff Roche U.S. Retirement Plans Master Trust is a defined benefit pension plan sponsored by Genentech, Inc. Genentech, Inc. is a wholly-owned subsidiary of Roche Holdings, Inc. Genentech, Inc. is an indirect subsidiary of Roche Holding Ltd. The shares of Roche Holding Ltd., which is a Swiss company, are in bearer form. There is no stock registry or other record indicating the identity of its shareholders or the extent of their holdings. Novartis AG, Basel, Switzerland, a publicly-held company, and its affiliates own approximately 33.3330% of the voting shares of Roche Holding Ltd. Novartis AG has no representation on Roche Holding Ltd.'s board of directors and does not in any way control Roche Holding Ltd. or any of its subsidiaries. Apart from Roche Holding Ltd. (and, indirectly, Novartis AG), there is no publicly-held company with a 10% or greater ownership interest in Genentech, Inc.

34. The PIMCO Collective Investment Trust has no parent corporation or publicly held corporation owning 10% or more of its stock. The SEI Trust Company is wholly-owned by

SEI Investments Company. SEI Investments Company is a public company with no parent corporation or publicly held corporation owning 10% or more of its stock.


35. Interventure Fixed Income Investments Limited is wholly-owned by Spectrum Private Trust Company Limited. The Spectrum Private Trust Company Limited is wholly-owned by Appleby Services (Bermuda) Ltd. as trustee of The Spectrum Purpose Trust. Appleby Services (Bermuda) Ltd is a subsidiary of Appleby (Bermuda) Limited, a company incorporated in the Islands of Bermuda, with no parent corporation or publicly held corporation owning 10% or more of its stock.

36. Plaintiff Stichting Bedrijfspensioenfonds voor de Agrarische en Voedselvoorzieningshandel (“Bpf AVH”) is a limited liability Dutch foundation with no parent corporation or shareholders.

37. Western Asset Management Company (“Western Asset”) is an investment management firm headquartered in Pasadena, California. Western Asset is a wholly-owned subsidiary of Legg Mason, Inc., which is a publicly held corporation (NYSE: LM) with no parent corporation or publicly held corporation owning 10% or more of its stock.

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